

BLANK ROME LLP
Attorneys for Defendant
Jeremy J.O. Harwood (JH 9012)
405 Lexington Avenue
New York, NY 10174
(212) 885-5000

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

NOBLE SHIPPING INC.,

07 Civ. 8860(D.C.)

Plaintiff,

v.

HIGHLINE SHIPPING SDN BHD,

Defendant.

**AFFIDAVIT OF JEREMY J.O. HARWOOD
IN SUPPORT OF MOTION FOR COUNTERSECURITY**

STATE OF NEW YORK)
 :
 : ss.:
COUNTY OF NEW YORK)

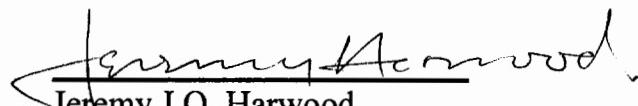
JEREMY J.O. HARWOOD, being duly sworn, deposes and says:

1. I am a partner of Blank Rome, LLP, and lead counsel for defendant HIGHLINE SHIPPING SDN BHD, in this action.
2. I attach hereto as Exhibit 1 a true copy of Plaintiff's counsel's advice letter of October 22 and 29, 2007 advising of successful attachments in this action.

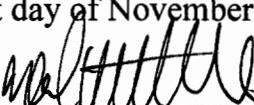
3. I am advised by my instructing solicitors, Clyde & Co. LLP, Singapore, that the underlying disputes in this action are subject to and were submitted to arbitration in Singapore in early 2006.

4. I am further advised that Highline has asserted a counterclaim in that arbitration of \$48,700 for outstanding demurrage and detention charges, which counterclaim arises from the same contract of affreightment dated October 13, 2003 (as amended) in respect of which Plaintiff has filed suit.

5. I attach as Exhibit 2 a copy of this Court's recent decision in another Rule B case.


Jeremy J.O. Harwood
Blank Rome LLP
405 Lexington Avenue
New York, New York 10174
Tel: 212-885-5000
Fax: 212-885-5001
jharwood@blankrome.com

Sworn to before me this
1st day of November 2007



Neal Mitchell
Notary Public

